

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

|   |   |
|---|---|
| <b>IN RE: VALSARTAN,<br/>LOSARTAN, AND IRBESARTAN<br/>PRODUCTS LIABILITY<br/>LITIGATION</b> | <b>MDL No. 2875</b><br><br><b>HON. ROBERT B. KUGLER</b> |
| <b>THIS DOCUMENT RELATES TO ALL<br/>CASES</b>   |   |

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Clem C. Trischler, Esq,**  
**PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP**  
**38<sup>TH</sup> Floor, One Oxford Centre**  
**Pittsburgh, Pennsylvania 15219**  
*Attorneys for Defendants Mylan Pharmaceuticals Inc. (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Jyothibasu Abbineni, Head of API Science and Operations, on June 14, 2021, at 5 a.m. eastern standard time, and continuing until completion, at Pietragallo Gordon Alfano Bosick & Raspanti, LLP, 38<sup>th</sup> Floor, One Oxford Center, Pittsburgh, Pennsylvania 15219, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall address the witness in his individual capacity. The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

LAYNE HILTON  
Kanner & Whiteley, L.L.C.  
701 Camp St.  
New Orleans, LA 70130  
Telephone: 504-524-5777  
Fax: 504-524-5763  
[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

June 11, 2021

**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Jyothibasu Abbineni.
2. The complete production of Jyothibasu Abbineni's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

|   |   |
|---|---|
| <b>IN RE: VALSARTAN,<br/>LOSARTAN, AND IRBESARTAN<br/>PRODUCTS LIABILITY<br/>LITIGATION</b> | <b>MDL No. 2875</b><br><br><b>HON. ROBERT B. KUGLER</b> |
| <b>THIS DOCUMENT RELATES TO ALL<br/>CASES</b>   |   |

**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2021, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ David J. Stanoch  
DAVID J. STANOCH  
Kanner & Whiteley, L.L.C.  
701 Camp St.  
New Orleans, LA 70130  
Telephone: 504-524-5777